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Attorneys for Defendant TikTok, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MICHAEL GRECCO
PRODUCTIONS, INC.,

Plaintiff,

v.

TIKTOK, INC.,

Defendant.

Case No. 2:24-CV-04837-FLA-MAR

**STIPULATION TO EXTEND TIME
TO RESPOND TO SECOND
AMENDED COMPLAINT**

Complaint Served: April 1, 2025

Current Response Date: April 15, 2025

New Response Date: April 29, 2025

Plaintiff Michael Grecco Productions, Inc. (“Plaintiff”) and Defendant TikTok, Inc. (“Defendant”) stipulate and respectfully request that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiff’s Second Amended Complaint by fourteen (14) days pursuant to Local Rule 8-3.

WHEREAS, on June 7, 2024, Plaintiff filed its initial Complaint in this action (ECF No. 1) and on July 2, 2024, the Parties stipulated to an extension of time for Defendant to respond to the Complaint while the parties discussed deficiencies in the

1 Complaint (ECF No. 14; ECF No. 20);

2 WHEREAS, on August 15, 2024, Plaintiff filed its First Amended Complaint
3 in this action (ECF No. 23) and Defendant moved to dismiss the First Amended
4 Complaint on August 29, 2024 (ECF No. 24);

5 WHEREAS, the Court granted Defendant's Motion to Dismiss on March 12,
6 2025 (ECF No. 45);

7 WHEREAS, on April 1, 2025, Plaintiff filed its Second Amended Complaint
8 in this action against Defendant (ECF No. 46) making Defendant's response to the
9 Second Amended Complaint due on April 15, 2025;

10 WHEREAS, Defendant has requested additional time to evaluate the
11 allegations in the Second Amended Complaint;

12 WHEREAS, Plaintiff and Defendant agree to a fourteen (14) day extension of
13 time to Defendant's deadline to answer or respond to the Second Amended
14 Complaint;

15 THEREFORE, Plaintiff and Defendant stipulate to a fourteen (14) day
16 extension of time, making Defendant's answer or response to Plaintiff's Second
17 Amended Complaint due on April 29, 2025.

18 It is so stipulated.

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1 Dated: April 8, 2025

DORSEY & WHITNEY LLP

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3 By: /s/ J. Michael Keyes
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23
24 Dated: April 8, 2025

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*Attorney for Plaintiff Michael Grecco
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29 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
30 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
31 content and have authorized this filing.

CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2025, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ J. Michael Keyes
J. Michael Keyes, SBN 262281